

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	Criminal No. 1:11-CR-00302
	:	
v.	:	(Electronically Filed)
	:	
HUMPRHEY E. HOLMES	:	(Judge Rambo)

MOTION TO CONTINUE FINAL SUPERVISED RELEASE HEARING

AND NOW, comes the defendant, Humphrey E. Holmes, by his attorney, Heidi R. Freese, Esquire, and files this Motion to Continue Final Supervised Release Hearing, averring as follows:

1. On July 20, 2016, a Petition for Warrant was filed, charging Mr. Holmes with violation of his supervised release.
2. On July 22, 2016, Mr. Holmes appeared before Magistrate Judge Carlson for an initial appearance and an Order was entered setting conditions of release for Mr. Holmes.
3. The revocation hearing in this matter is scheduled for August 3, 2016 in before this Honorable Court.
4. One of the alleged violations of supervised release stems from new criminal charges which were filed against Mr. Holmes in the Dauphin County Court of

Common Pleas, specifically Theft by Deception, Bad Check and Conspiracy to commit those crimes.

5. Mr. Holmes is scheduled to appear for a pretrial conference on these new charges in the Dauphin County Court of Common Pleas on August 10, 2016.

6. It is believed that continuing the revocation proceeding to a date and time after the August 10, 2016 hearing in state court is in the interest of justice, as the outcome of Mr. Holmes' pending state charges will impact his federal revocation proceedings.

7. Assistant United States Attorney Michael Consiglio, Esquire, concurs in this continuance request.

WHEREFORE, for the foregoing reasons, it is respectfully requested that this Honorable Court grant the within Motion to Continue Final Revocation Hearing.

Respectfully submitted,

Date: July 25, 2016

/s/ Heidi R. Freese
Heidi R. Freese, Esquire
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CERTIFICATE OF SERVICE

I, Heidi R. Freese, Esquire, of the Federal Public Defender's Office, do hereby certify that I served a copy of the foregoing **Motion to Continue Final Revocation Hearing**, via Electronic Case Filing, and/or by placing a copy in the United States mail, first class in Harrisburg, Pennsylvania, and/or by hand delivery, addressed to the following:

MICHAEL CONSIGLIO, ESQUIRE
United States Attorney's Office
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Harrisburg, PA 17101
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HUMPHREY E. HOLMES

Date: July 25, 2016

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